

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PLUMBERS, PIPEFITTERS AND	:	Civil Action No. 1:08-cv-06613-BSJ-THK
APPRENTICES LOCAL NO. 112 PENSION	:	
FUND, Individually and on Behalf of All	:	<u>CLASS ACTION</u>
Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
CIT GROUP INC., et al.,	:	
	:	
Defendants.	:	
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TODD KATZ and KATZ IMPORTS, INC., on	:	Civil Action No. 1:08-cv-07256-BSJ
Behalf of Themselves and All Others Similarly	:	
Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
CIT GROUP INC., et al.,	:	
	:	
Defendants.	:	
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JAMES APOSTLE, Individually and on Behalf	:	Civil Action No. 1:08-cv-07431-BSJ
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
CIT GROUP INC., et al.,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Institutional Investors Plumbers, Pipefitters and Apprentices Local No. 112 Pension Fund (“Local 112”) and Pensioenfonds Horeca & Catering (“PH&C”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing PH&C as Lead Plaintiff; (iii) approving PH&C’s selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Local 112 and PH&C submit herewith a Memorandum of Law and Declaration of David A. Rosenfeld, dated September 23, 2008.

DATED: September 23, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA, JR.

/s/ David A. Rosenfeld
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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Rosenfeld

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Mailing Information for a Case 1:08-cv-06613-BSJ-THK

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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CIT GROUP

Service List - 9/22/2008 (08-0145)

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